

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
Roanoke Division**

BAE SYSTEMS ORDNANCE SYSTEMS,  
INC.,

*Plaintiff/Counter-Defendant,*

v.

FLUOR FEDERAL SOLUTIONS, LLC,

*Defendant/Counter-Plaintiff.*

Case No. 7:20-cv-587

**JOINT MOTION TO MODIFY SCHEDULING ORDER**

Plaintiff/Counterclaim-Defendant BAE Systems Ordnance Systems, Inc. (“BAE”) and Defendant/Counterclaim-Plaintiff Fluor Federal Solutions, LLC (“Fluor”) jointly submit this Motion to Modify the Scheduling Order in this action.

After conferring about the deadlines in this matter, the Parties jointly agree to and request the following additions and changes to the Court’s Scheduling Order entered July 12, 2021 (ECF No. 48):

- A. The deadline for any Motions to Join Other Parties or Amend Pleadings will be **February 28, 2022**.
- B. The deadline to exchange initial expert disclosures and reports for both Parties be changed to **October 7, 2022**;
- C. The deadline to exchange rebuttal expert disclosures and reports for both Parties be changed to **November 11, 2022**;
- D. The deadline to complete fact discovery be changed to **November 16, 2022**.
- E. The deadline for supplemental expert reports will be **December 1, 2022**.

F. The deadline to complete expert depositions will be **December 12, 2022**;

G. The deadline to file dispositive motions and motions to exclude experts be changed to **December 19, 2022**.

H. The deadline to file motions in limine will be **January 27, 2023**.

I. The deadline for the parties to exchange witness and exhibit lists will be **January 31, 2023**.

J. The deadline for deposition designations will be **January 31, 2023**.

K. The deadline for counterdesignations and objections to deposition designations will be **February 7, 2023**.

L. The deadline for objections to counterdesignations will be **February 14, 2023**.

M. The deadline for proposed findings of fact and conclusions of law will be **February 27, 2023**.

All remaining deadlines set forth in the Court's original Scheduling Order (ECF No. 48) remain the same, and the changes above will not impact the scheduled trial date for this matter.

WHEREFORE, the Parties respectfully request that the Court enter the proposed amended scheduling order, attached hereto as **Exhibit 1**, which reflects the changes identified above.

Agreed: September 24, 2021

/s/ Jeffrey J. Golimowski  
*Counsel for BAE Systems Ordnance Systems, Inc.*

Todd M. Conley (VSB No. 89839)  
Jeffrey J. Golimowski (VSB No. 93525)  
WOMBLE BOND DICKINSON (US) LLP  
8350 Broad Street, Suite 1500  
Tysons, VA 22102  
Telephone: (703) 394-2245  
todd.conley@wbd-us.com  
jeff.golimowski@wbd-us.com

/s/ Scott P. Fitzsimmons  
*Counsel for Fluor Federal Solutions, LLC*

Scott P. Fitzsimmons, Esq. (VSB 68147)  
Sarah K. Bloom, Esq. (VSB 94406)  
WATT, TIEDER, HOFFAR  
& FITZGERALD, LLP  
1765 Greensboro Station Place, Suite  
1000  
McLean, Virginia 22102  
Tel: (703) 749-1000  
Fax: (703) 893-8029

Joshua R. Treece (VSB No. 79149)  
jtreece@woodsrogers.com  
Justin E. Simmons (VSB No. 77319)  
jsimmons@woodsrogers.com  
WOODS ROGERS PLC  
10 South Jefferson Street, Suite 1800  
Roanoke, Virginia 24011  
Telephone: (540) 983-7600  
Facsimile: (540) 983-7711

[sfitzsimmons@watttieder.com](mailto:sfitzsimmons@watttieder.com)  
[sbloom@watttieder.com](mailto:sbloom@watttieder.com)